

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NOS. 1:16-CR-344-TDS-1 & 1:16-CR-00392-TDS-1**

UNITED STATES OF AMERICA

Plaintiff,

vs.

FLETCHER LEE HARTSELL, JR.

Defendant.

**DEFENDANT’S UNOPPOSED
MOTION FOR RETURN
OF PASSPORT**

COMES NOW Defendant, Fletcher Lee Hartsell, Jr. (“Mr. Hartsell”), through counsel, and hereby respectfully moves the Court for an Order directing the return of his passport before its expiration (the “Motion”). This Motion is based upon the following grounds: 1) Mr. Hartsell has family, friends and employment in North Carolina; 2) Mr. Hartsell does not pose a flight risk; 3) Mr. Hartsell continues to be an active, productive member of society; and 4) Mr. Hartsell’s current passport will expire on September 1, 2019 before the expiration of his term of supervised release. In support of this Motion, Mr. Hartsell states the following:

1. The Court entered an Order Setting Conditions of Release (Doc. Nos. 12 (Case No. 1:16-CR-344) and 6 (Case No. 1:16-CR-391)).

2. One of the conditions of his release included the requirement that Mr. Hartsell surrender his United States Passport to a United States Probation/Pretrial Services Officer.

3. Mr. Hartsell now seeks the return of his passport for the purpose of renewing the passport before it expires and also, pending prior approval from the Court or his Probation Officer, for possible travel to Quetzaltenango (Xela), Guatemala in late fall, 2019, for charity work with the Good Shepherd Children's Home, Clinic and Training Center, in which he previously participated before his incarceration.

4. Mr. Hartsell has complied with all conditions of release, and has repeatedly, without prior permission, successfully traveled throughout the state of North Carolina, without incident.

5. Mr. Hartsell now seeks an Order directing the return of his passport in order that he may renew the passport prior to its expiration date, which will occur before the completion of the Mr. Hartsell's three (3) year term of supervised release.

6. Defense counsel has corresponded with Assistant United States Attorney Joanna McFadden, who has indicated that she does not oppose this Motion.

WHEREFORE, Defendant Fletcher Lee Hartsell, Jr. respectfully moves this Court for an Order directing the return of his passport before its expiration date of September 1, 2019.

This 17th day of July 2019.

/s/ Richard S. Glaser
Richard S. Glaser
N.C. State Bar No. 13998

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date, the foregoing **Defendant's Unopposed Motion for Return of Passport** was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification and serve same upon all counsel of record via the Court's electronica case filing system.

This the 17th day of July, 2019.

/s/ Richard S. Glaser

Richard S. Glaser

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